

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

<b>CONSOLIDATED INDUSTRIES, LLC</b>	)	
<b>d/b/a WEATHER KING PORTABLE</b>	)	
<b>BUILDINGS,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	<b>No. 1:22-cv-01230-STA-jay</b>
<b>v.</b>	)	
	)	
<b>JESSE A. MAUPIN, <i>et al.</i>,</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFF’S MOTION FOR *IN CAMERA* REVIEW OF WITHHELD DOCUMENTS**

Plaintiff requests that the Court conduct an *in camera* review of certain documents in Defendants’ possession that Defendants have withheld on the basis of the attorney-client privilege. Specifically, Plaintiff requests that the Court review certain text messages that Defendants Jesse Maupin and Ryan Brown exchanged with Douglas Hines, a principal of JADE Rentals, LLC (“JADE”), who happens to also be an attorney (but does not serve as Defendants’ attorney of record in this case). JADE produced documents to Defendants for screening in response to Plaintiff’s subpoena, and thereafter, Defendants instructed the documents stamped as Nos. 245-246 and 279-285 be withheld. Plaintiff requests that those documents be reviewed.

As grounds for this motion, Plaintiff submits that it has good reason to question Defendants’ attempt to invoke the attorney-client privilege and that an *in camera* review of the text messages is warranted. In support of this motion, Plaintiff has filed herewith a memorandum of law and the following exhibits:

1. Plaintiff’s subpoena to JADE, filed herewith as Exhibit 1.

2. Joint Status Report filed in S.D. Ill. Case No. 23-mc-113-SPM, filed herewith as Exhibit 2.
3. Defendants' Privilege Log, filed herewith as Exhibit 3.
4. Excerpt of JADE's production in response to Plaintiff's subpoena, filed herewith as Exhibit 4.
5. Excerpt of Defendant Ryan Brown's responses to Plaintiff first set of written discovery, filed herewith as Exhibit 5;
6. Excerpt of Defendant Jesse Maupin's responses to Plaintiff first set of written discovery, filed herewith as Exhibit 6;
7. Email correspondence between the parties' counsel filed herewith as Exhibit 7;
8. Letter from Douglas Hines dated August 8, 2023, filed herewith as Exhibit 8.
9. Excerpt of Defendant American Barn Co., LLC's Fourth Supplemental Responses to Plaintiff's first set of written discovery, filed herewith as Exhibit 9.

Respectfully submitted,

BUTLER SNOW LLP

/s/ David L. Johnson

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 4, 2024, I filed the foregoing with the Court using the ECF system, which will provide notice and a copy to counsel of record:

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And a copy has been provided via fax to the following:

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/s/ David L. Johnson  
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